

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE EASTERN DISTRICT OF MICHIGAN

JOHN PLAINTIFF,

Plaintiff,

vs.

Case No. 2:20-cv-11718-GAD-DRG

WAYNE STATE UNIVERSITY, WAYNE  
STATE UNIVERSITY SCHOOL OF  
MEDICINE, NICOLINA CAMAJ, MARGIT  
CHADWELL, MATTHEW JACKSON,  
RICHARD S. BAKER, R. DARIN ELLIS,  
in their individual and official  
capacities, jointly and severally,  
Defendants.

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The Remote Zoom Videoconference Deposition of  
NICOLINA CAMAJ,  
Taken at 280 North Old Woodward Avenue,  
Birmingham, Michigan,  
Commencing at 10:04 a.m.,  
Wednesday, October 6, 2021,  
Before Leisa M. Pastor, CSR-3500, RPR, CRR.

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<p style="text-align: right;">Page 42</p> <p>1 on what is marked in blue at the top, page 11 of 20,</p> <p>2 and ask you or give you time to read that paragraph.</p> <p>3 <b>A. Is this the one that I'm looking at?</b></p> <p>4 Q. Let's make sure it is.</p> <p>5 <b>A. It starts with "As noted above..."?</b></p> <p>6 MR. FLORES: Bailey?</p> <p>7 EXHIBIT TECHNICIAN: Yes.</p> <p>8 <b>THE WITNESS: Okay.</b></p> <p>9 MR. FLORES: Yeah, so if you'll read that</p> <p>10 last paragraph, and then it flips over to the next</p> <p>11 page. Bailey, when she's ready, just move it to that</p> <p>12 next page so she can read the remainder of that</p> <p>13 paragraph.</p> <p>14 EXHIBIT TECHNICIAN: Yes.</p> <p>15 <b>THE WITNESS: Okay, I'm ready.</b></p> <p>16 <b>Okay.</b></p> <p>17 BY MR. FLORES:</p> <p>18 Q. Okay. Does that refresh your recollection about the</p> <p>19 required standard of evidence that the civil rights</p> <p>20 office said was applicable in Title IX cases?</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. And your testimony earlier was that at Wayne State or,</p> <p>23 rather, at Loyola, the standard of evidence was a</p> <p>24 preponderance of the evidence; is that correct?</p> <p>25 <b>A. Yes.</b></p>	<p style="text-align: right;">Page 44</p> <p>1 a stir within the Title IX community? Are you</p> <p>2 familiar with that?</p> <p>3 MR. PORTER: Objection to form.</p> <p>4 <b>A. I'm not sure what you're referring to.</b></p> <p>5 BY MR. FLORES:</p> <p>6 Q. Well, let's just skip that. Let's go to page 17 of</p> <p>7 this document, please, Bailey. And go down a little</p> <p>8 farther. Stop right there. Can you please read that</p> <p>9 paragraph to yourself, Ms. Camaj, the top paragraph?</p> <p>10 <b>A. The top?</b></p> <p>11 Q. It starts with "When OCR finds..."</p> <p>12 <b>A. Okay.</b></p> <p>13 Q. Do you understand who the letter is referring to when</p> <p>14 it talks about "recipient"?</p> <p>15 <b>A. I'm going to assume it's the -- the university.</b></p> <p>16 Q. That's correct. That's my understanding, as well.</p> <p>17 So in your words, can you tell me based on</p> <p>18 this paragraph what one of the major penalties the OCR</p> <p>19 can impose on a university if they fail to properly</p> <p>20 enforce Title IX?</p> <p>21 MR. PORTER: Objection, form.</p> <p>22 <b>A. Well, it says it right there in the last sentence,</b></p> <p>23 <b>"funding."</b></p> <p>24 BY MR. FLORES:</p> <p>25 Q. Okay. Did you ever receive any training once you</p>
<p style="text-align: right;">Page 43</p> <p>1 Q. What was the standard of evidence when you arrived at</p> <p>2 Wayne State Title IX cases?</p> <p>3 MR. PORTER: Objection, foundation.</p> <p>4 BY MR. FLORES:</p> <p>5 Q. Do you -- I'm sorry, let me rephrase it. When you</p> <p>6 first arrived at Wayne State, did you take time to</p> <p>7 familiarize yourself with the Title IX process as it</p> <p>8 was carried out at Wayne State?</p> <p>9 <b>A. I will say that I was not a Title IX investigator my</b></p> <p>10 <b>first year at Wayne State, and of course, I</b></p> <p>11 <b>familiarized myself as a part of our training in being</b></p> <p>12 <b>a responsible employee, and it was a preponderance of</b></p> <p>13 <b>evidence.</b></p> <p>14 Q. So from 2018 until sometime in 2019, you were not a</p> <p>15 Title IX investigator?</p> <p>16 <b>A. Correct.</b></p> <p>17 Q. What was your title?</p> <p>18 <b>A. Associate director and student conduct officer.</b></p> <p>19 Q. And how did the responsibilities of that job differ</p> <p>20 from a Title IX investigator?</p> <p>21 <b>A. Well, I'm not responsible to hear Title IX cases or</b></p> <p>22 <b>investigate them.</b></p> <p>23 Q. One of the reasons that -- or, rather, are you aware</p> <p>24 that when the -- that the Department of Civil -- the</p> <p>25 Office of Civil Rights' Dear Colleague letter created</p>	<p style="text-align: right;">Page 45</p> <p>1 became a Title IX investigator as to the consequences</p> <p>2 of not performing your job properly?</p> <p>3 MR. PORTER: Objection, form.</p> <p>4 <b>A. Not specifically other than to say, you know, but we</b></p> <p>5 <b>are aware that we must follow proceedings because they</b></p> <p>6 <b>will take funding away, so that's something that we</b></p> <p>7 <b>were aware of, that I was aware of.</b></p> <p>8 BY MR. FLORES:</p> <p>9 Q. All right, thank you.</p> <p>10 MR. FLORES: All right, you can take that</p> <p>11 document down, Bailey.</p> <p>12 BY MR. FLORES:</p> <p>13 Q. Now, do you remember whether or not you disclosed to</p> <p>14 Wayne State that you were sued in federal court, you</p> <p>15 were a named defendant for a period of time while you</p> <p>16 were at Loyola?</p> <p>17 MR. PORTER: I'm sorry, can you repeat</p> <p>18 the -- I didn't catch the first part of that question.</p> <p>19 BY MR. FLORES:</p> <p>20 Q. Did you disclose to Wayne State when you were being</p> <p>21 interviewed that you had been sued in federal court</p> <p>22 for violating Title IX?</p> <p>23 <b>A. No, because I was not a part -- I never participated</b></p> <p>24 <b>in the proceedings.</b></p> <p>25 Q. But you knew that you were a named party to that</p>

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<p style="text-align: right;">Page 46</p> <p>1 lawsuit though?</p> <p>2 <b>A. To be honest, I don't recall being -- I really don't</b></p> <p>3 <b>remember.</b></p> <p>4 Q. Okay. That's fine, thank you.</p> <p>5 <b>A. Yeah.</b></p> <p>6 Q. During your first year at Wayne State, what were your</p> <p>7 primary duties on a daily basis?</p> <p>8 <b>A. Okay. So I was serving as a student conduct officer.</b></p> <p>9 <b>I also supervised our office staff along with</b></p> <p>10 <b>Dr. Strauss. We also in our office received CARE</b></p> <p>11 <b>reports from the community about concerns they have</b></p> <p>12 <b>about students, so I served as what you would call a</b></p> <p>13 <b>CARE officer and respond and contact students and</b></p> <p>14 <b>offer resources, so I would serve in both of those</b></p> <p>15 <b>roles. I would also offer trainings about academic</b></p> <p>16 <b>misconduct process, and so that was the extent, and</b></p> <p>17 <b>meet with other departments to train their faculty</b></p> <p>18 <b>about the procedures and their responsibility in the</b></p> <p>19 <b>process.</b></p> <p>20 Q. So you seem to be making a distinction between student</p> <p>21 conduct offenses and Title IX offenses. Can you</p> <p>22 explain what the difference is?</p> <p>23 <b>A. Well, Title IX, if you violate a Title IX pol -- it's</b></p> <p>24 <b>in the code. But what I'm making the distinction on</b></p> <p>25 <b>is the types of responses in terms of investigation</b></p>	<p style="text-align: right;">Page 48</p> <p>1 you would during your first year not have authority to</p> <p>2 investigate?</p> <p>3 <b>A. I wouldn't investigate anything Title IX because I'm</b></p> <p>4 <b>not an investigator at that time.</b></p> <p>5 Q. So any --</p> <p>6 <b>A. If anything -- if I hear about a Title IX matter, I</b></p> <p>7 <b>would forward it on to the director because I didn't</b></p> <p>8 <b>serve in that capacity.</b></p> <p>9 Q. Were there any significant differences in how student</p> <p>10 conduct cases were handled at Loyola and Wayne State?</p> <p>11 MR. PORTER: Objection, form.</p> <p>12 <b>A. In Loyola, I -- the students didn't have the</b></p> <p>13 <b>opportunity to accept or deny the addition of a</b></p> <p>14 <b>hearing officer, whereas with the Student Code of</b></p> <p>15 <b>Conduct, they have that opportunity, so that's one</b></p> <p>16 <b>difference.</b></p> <p>17 <b>And of course, language is different, but</b></p> <p>18 <b>you know, every code's language was a bit different.</b></p> <p>19 Q. Did you receive any training when you first arrived at</p> <p>20 Wayne State on the Wayne State Student Code of</p> <p>21 Conduct?</p> <p>22 <b>A. I had meetings with the previous person in that</b></p> <p>23 <b>position.</b></p> <p>24 Q. Did you receive materials or binders or any kind of</p> <p>25 other documentation about what the responsibilities</p>
<p style="text-align: right;">Page 47</p> <p>1 <b>because Title IX has specific procedures to follow</b></p> <p>2 <b>that differ with my day-to-day job. So when I meet</b></p> <p>3 <b>with students for concerns, it differs. I don't have</b></p> <p>4 <b>any of the same responsibilities that I would to</b></p> <p>5 <b>Title IX procedures.</b></p> <p>6 Q. So is it fair to say that you might be investigating</p> <p>7 the exact same type of case, but sometimes it is</p> <p>8 covered by Title IX and sometimes it isn't?</p> <p>9 <b>A. No.</b></p> <p>10 MR. PORTER: Objection, form.</p> <p>11 <b>A. No, that's not what I'm saying.</b></p> <p>12 BY MR. FLORES:</p> <p>13 Q. Okay. Give me an example of a typical student conduct</p> <p>14 offense that you would investigate.</p> <p>15 <b>A. If there was a fight between students and somebody</b></p> <p>16 <b>filed charges alleging that one or the other violated</b></p> <p>17 <b>the code, and a typical charge in that code might be</b></p> <p>18 <b>under the section 4.3 or 4.6 of our student code, so</b></p> <p>19 <b>it could be physical or verbal threats or abuse, or</b></p> <p>20 <b>you could file a 4.6, which is disorderly behavior,</b></p> <p>21 <b>and so I could hear that case and make a</b></p> <p>22 <b>determination, and then the student, in turn, gets to</b></p> <p>23 <b>accept or deny my determination. So that's one</b></p> <p>24 <b>example.</b></p> <p>25 Q. Okay. And is -- can you describe a Title IX case that</p>	<p style="text-align: right;">Page 49</p> <p>1 were for someone assuming your position from --</p> <p>2 <b>A. We had -- you have the student code of conduct that</b></p> <p>3 <b>tells you what is expected of you.</b></p> <p>4 Q. Was there any -- I'm sorry.</p> <p>5 <b>A. Another --</b></p> <p>6 Q. Was there any other material? Was there any other</p> <p>7 material?</p> <p>8 <b>A. Sure, sure. Materials in terms of, you know, sample</b></p> <p>9 <b>letters that you would normally send out to students</b></p> <p>10 <b>or sample, what do you call it, outcome letters, like,</b></p> <p>11 <b>what I'm referring to, when a decision is made to make</b></p> <p>12 <b>sure you include all the information for the student</b></p> <p>13 <b>when they receive your letter about your outcome. So</b></p> <p>14 <b>I got to see what was sent out before.</b></p> <p>15 Q. And I may have cut you off. Was there an additional</p> <p>16 manual or policy manual that also was included in the</p> <p>17 material that you were provided?</p> <p>18 <b>A. Everything is online, so everything there is to read</b></p> <p>19 <b>about our policies and procedures is all available</b></p> <p>20 <b>online.</b></p> <p>21 Q. Have you had a chance to read the complaint filed in</p> <p>22 this case?</p> <p>23 <b>A. No.</b></p> <p>24 Q. I want to talk a little bit about kind of generic</p> <p>25 investigation directives and policies that you may or</p>

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<p style="text-align: right;">Page 50</p> <p>1 may not have had at Wayne State just to get an idea as</p> <p>2 to what parameters you were working within during that</p> <p>3 first year. Would you agree or disagree with the</p> <p>4 statement that every investigation is unique?</p> <p>5 MR. PORTER: Objection, form.</p> <p>6 <b>A. Every investigation can be unique.</b></p> <p>7 BY MR. FLORES:</p> <p>8 Q. Okay. You're making a distinction different from my</p> <p>9 statement. Can you explain that?</p> <p>10 <b>A. You may have similarities in investigations, so in a</b></p> <p>11 <b>lot of ways, they could be similar, and then in other</b></p> <p>12 <b>ways, it could be unique just on virtue of different</b></p> <p>13 <b>human beings participating.</b></p> <p>14 Q. Okay. Would you agree that it's important to have a</p> <p>15 strategy when starting an investigation?</p> <p>16 <b>A. I would say yeah, you want to strategize, sure,</b></p> <p>17 <b>mm-hmm.</b></p> <p>18 Q. And would you agree that an experienced and</p> <p>19 well-trained investigator typically has a well</p> <p>20 developed strategy that he or she uses to make sure</p> <p>21 that all aspects of the case are covered?</p> <p>22 MR. PORTER: Objection, foundation. Are</p> <p>23 you asking her about her Title IX investigation</p> <p>24 duties --</p> <p>25 <b>THE WITNESS: Yeah.</b></p>	<p style="text-align: right;">Page 52</p> <p>1 <b>a nonacademic misconduct form that's submitted, that's</b></p> <p>2 <b>typically indicative of someone who wants to file</b></p> <p>3 <b>charges against a student because they believe they</b></p> <p>4 <b>violated the code of conduct, and even then, I clarify</b></p> <p>5 <b>the charges they selected because they're not all</b></p> <p>6 <b>experts in the code, and so sometimes they select a</b></p> <p>7 <b>charge that's not to relevant to what they're sharing</b></p> <p>8 <b>in terms of the information they're concerned about,</b></p> <p>9 <b>and then I would clarify that, and so it becomes a</b></p> <p>10 <b>code of conduct, that's how I would proceed.</b></p> <p>11 I would just always reply to the person</p> <p>12 filing the report to get a better understanding of the</p> <p>13 complaint so I know, you know, which way to proceed.</p> <p>14 Q. So once you've had a chance to talk to the reporter</p> <p>15 and provide that reporter with some additional</p> <p>16 information, what's the next step?</p> <p>17 <b>A. Well, if it's not a conduct charge, it depends on what</b></p> <p>18 <b>the desired outcome is. Is it coming from a faculty</b></p> <p>19 <b>member? Is it coming from a student? Is it coming</b></p> <p>20 <b>from staff? It could be anything that we -- we get</b></p> <p>21 <b>all kinds of reports, so we really have to assess what</b></p> <p>22 <b>are we following up with. Are we following up with</b></p> <p>23 <b>the student's concerning behavior that needs to stop?</b></p> <p>24 <b>Are we following up with a simple question? It just</b></p> <p>25 <b>really varies.</b></p>
<p style="text-align: right;">Page 51</p> <p>1 MR. PORTER: -- or her role as Student Code</p> <p>2 of Conduct --</p> <p>3 MR. FLORES: Let me rephrase.</p> <p>4 BY MR. FLORES:</p> <p>5 Q. With respect to title -- to your responsibilities as a</p> <p>6 Title IX investigator, which you assumed in your</p> <p>7 second year, would you agree that a well developed</p> <p>8 strategy is necessary in order to make sure all of the</p> <p>9 bases are covered?</p> <p>10 <b>A. Yeah.</b></p> <p>11 Q. So as a student conduct officer, you have different</p> <p>12 responsibilities, but you're also conducting</p> <p>13 investigations; is that correct?</p> <p>14 <b>A. Mm-hmm.</b></p> <p>15 Q. Can you tell me just generically when you receive a</p> <p>16 complaint, what was your -- typically your first</p> <p>17 action after receiving the complaint?</p> <p>18 <b>A. It depends on how I received the complaint. Is it via</b></p> <p>19 <b>email, is it via phone call, is it via the forms we</b></p> <p>20 <b>have online and which form is used? There's a</b></p> <p>21 <b>complaint form, there's a nonacademic misconduct form,</b></p> <p>22 <b>and there's an academic misconduct form, so depending</b></p> <p>23 <b>on the form and what's written, I would respond by</b></p> <p>24 <b>writing to the reporter and ask them to specify what</b></p> <p>25 <b>their concerns are, and if it's a -- where -- if it's</b></p>	<p style="text-align: right;">Page 53</p> <p>1 Q. Let's take a complaint from one student against</p> <p>2 another. You had received a complaint, you've now</p> <p>3 responded to the reporter to try and narrow and</p> <p>4 clarify what they're complaining about, and after that</p> <p>5 takes place, what's the next step for you?</p> <p>6 <b>A. Sure. If it's a -- if it's a student who's -- let's</b></p> <p>7 <b>say it's a roommate or someone like that or they're</b></p> <p>8 <b>concerned about a friend's behavior and they would</b></p> <p>9 <b>like us to just have a conversation with the student</b></p> <p>10 <b>about their concerning behavior and then we will do</b></p> <p>11 <b>that, we'll follow up with that other student and have</b></p> <p>12 <b>a conversation.</b></p> <p>13 If it's an issue where they would like to</p> <p>14 file charges against the roommate because they have</p> <p>15 been affected and they thought that the student</p> <p>16 violated the policy, then I would proceed by inviting</p> <p>17 the student to meet with me and deal with it in a</p> <p>18 conduct matter.</p> <p>19 Q. How would you reach out to the student that is accused</p> <p>20 in a student conduct case?</p> <p>21 <b>A. Sending them a letter.</b></p> <p>22 Q. And is that -- that's not snail mail, that's an</p> <p>23 electronic letter; is that correct?</p> <p>24 <b>A. We transitioned to both. When I first started at</b></p> <p>25 <b>Wayne State, we would send letters via mail, and then</b></p>



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<p style="text-align: right;">Page 54</p> <p>1 we transitioned to electronically, and we use our</p> <p>2 Maxient software system to send students letters to</p> <p>3 invite them to meetings with us, both concerning</p> <p>4 behavior meetings, complaint meetings, and also</p> <p>5 conduct meetings. They all get the letter from</p> <p>6 Maxient software.</p> <p>7 Q. Are there any time limitations or time recommendations</p> <p>8 in order to -- from the time that you get a complaint</p> <p>9 until the time that you reach out to the accused</p> <p>10 student?</p> <p>11 A. Not with concerning behavior or -- and if a</p> <p>12 complaint -- if it's a conduct matter, we try to be --</p> <p>13 we try to expedite matters. The only time that we</p> <p>14 cannot be, you know, timely is if we have taken</p> <p>15 vacation days or typically in the beginning of the</p> <p>16 school year when we have more cases, it takes up a lot</p> <p>17 of our time, so it could be delayed by a week, but</p> <p>18 it's always our intention to respond quickly. So I</p> <p>19 know myself personally, I never have the intention to</p> <p>20 delay, and I can only be impacted if I've taken time</p> <p>21 away or I have trainings to attend to that keep me out</p> <p>22 of the office.</p> <p>23 Q. And is there typically a timeframe that you gave to</p> <p>24 the accused in terms of when they need to respond back</p> <p>25 with you?</p>	<p style="text-align: right;">Page 56</p> <p>1 it will be, obviously, on Teams video or Zoom</p> <p>2 depending on what the student has at their desktop.</p> <p>3 Q. So during the first year that you were at Wayne State,</p> <p>4 you would meet in your office with any student that</p> <p>5 was coming at your invitation?</p> <p>6 A. Right.</p> <p>7 Q. And what happens if a student declines your</p> <p>8 invitation, says I don't want to meet with you?</p> <p>9 A. It depends on what I'm asking them to meet for. You</p> <p>10 know, when I reach out to students to offer them</p> <p>11 resources and support as -- in my role as a care</p> <p>12 officer, that's fine, they don't have to meet with me.</p> <p>13 If it's a behavioral concern where I'm</p> <p>14 requesting them to meet with me and it's something</p> <p>15 that the dean of students is aware of, I will let him</p> <p>16 know that, hey, this student hasn't met with me, and</p> <p>17 then, and then he will make a determination if he will</p> <p>18 meet with them and follow up. And if a student</p> <p>19 doesn't meet with me for conduct, it goes over to the</p> <p>20 dean, and that's on 11 -- in section 11, it tells you</p> <p>21 that if a student fails to show up, then the conduct</p> <p>22 officer needs to refer the case to the dean of</p> <p>23 students. So anyone that doesn't meet with me, I</p> <p>24 notify the dean of students to let him know in any</p> <p>25 case.</p>
<p style="text-align: right;">Page 55</p> <p>1 A. I typically don't give a timeframe in terms of -- it</p> <p>2 depends on is it my outcome letter that they need to</p> <p>3 respond to or my -- to meet with me after I assign</p> <p>4 them a meeting time? I'm not sure what you're asking.</p> <p>5 Q. Yeah, I'm still at the requesting a meeting with that</p> <p>6 student.</p> <p>7 A. Mm-hmm.</p> <p>8 Q. So --</p> <p>9 A. Yeah, I will -- I will select the date, and they're</p> <p>10 told if they're not able to make that meeting time,</p> <p>11 they need to contact me within 48 hours, and I will</p> <p>12 reschedule our meeting. And I'm very flexible with</p> <p>13 that.</p> <p>14 Q. Now --</p> <p>15 A. Especially if a student has to go on vacation or</p> <p>16 something, I can meet with them later on.</p> <p>17 Q. Okay. So there's flexibility --</p> <p>18 A. Yes.</p> <p>19 Q. -- in the timing of --</p> <p>20 A. Right.</p> <p>21 Q. -- meeting with you?</p> <p>22 A. Right.</p> <p>23 Q. And where does the meeting with you typically take</p> <p>24 place?</p> <p>25 A. Typically in my office, and then when we are remote,</p>	<p style="text-align: right;">Page 57</p> <p>1 Q. When you meet with a student, are you in a separate</p> <p>2 room, or are you out in the open with the student?</p> <p>3 What are the circumstances of that, the physical</p> <p>4 circumstances of that meeting?</p> <p>5 A. Sure. The dean of students has an office suite, and</p> <p>6 inside that suite, I have my own office. The students</p> <p>7 are positioned by the door, and I'm positioned on the</p> <p>8 far wall behind a desk, and I allow the student to</p> <p>9 keep the door open or to close the door depending on</p> <p>10 their comfortability.</p> <p>11 Q. And what's your -- how do you typically present</p> <p>12 materials in a student conduct situation to the</p> <p>13 student that's come in to -- for this meeting?</p> <p>14 A. Well, the student code tells the student, and I know a</p> <p>15 lot of students don't read the code, it tells them</p> <p>16 that if you wanted materials presented to you prior to</p> <p>17 your meeting, you can contact the conduct officer, and</p> <p>18 that will be supplied to you, obviously redacted if</p> <p>19 there's any information that needs to be redacted, and</p> <p>20 then during my meeting, I let the -- well, before</p> <p>21 that, in the letter that's sent to them, they are</p> <p>22 notified of the specific charge, so they will be told,</p> <p>23 you know, this is the violation that's alleged to have</p> <p>24 occurred, 4.6, 4.3, and we give them the specifics of</p> <p>25 the account, about two or three sentences about what</p>

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<p style="text-align: right;">Page 82</p> <p>1 <b>A. Yeah, I'm the conduct officer, yep. That would have</b>  2 <b>been me.</b>  3 Q. Do you know who attended on behalf of the director of  4 counseling and psychological services?  5 <b>A. Yeah, Jeff.</b>  6 Q. Do you know a last name?  7 <b>A. We can submit -- Jeff Kuentzel.</b>  8 Q. Okay. Do you know who attended on behalf of the  9 director of student disability services?  10 <b>A. Randie Kruman.</b>  11 Q. Do you know who attended on behalf of the office of  12 general counsel?  13 <b>A. Would have been Linda Galante at that time.</b>  14 Q. Do you know who attended on behalf of the director of  15 the office of housing and residential life?  16 <b>A. I think -- I don't remember her last name, but Janine.</b>  17 <b>It may have been Janine. Janine was leaving the</b>  18 <b>institution, so I don't remember the date she left,</b>  19 <b>and then they were hiring, so I -- it would have been</b>  20 <b>her if there was somebody.</b>  21 Q. And do you know who attended on behalf of the crime  22 prevention section of the police department?  23 <b>A. Yes, Lieutenant Scott.</b>  24 Q. Do you remember during that meeting any discussion of  25 information that had been provided by Dean Chadwell?</p>	<p style="text-align: right;">Page 84</p> <p>1 they assigned the complaint to you for investigation?  2 <b>A. There was a time where I was informed that I should be</b>  3 <b>the person to speak to the complainant and to speak to</b>  4 <b>the respondent.</b>  5 Q. Was any other conduct officer or person in a similar  6 position to you assigned to work with you on this  7 case?  8 <b>A. No.</b>  9 Q. And was that standard operating procedure because of  10 the size or the nature of the complaint?  11 <b>A. I'm the only student conduct officer at the</b>  12 <b>university.</b>  13 Q. But there are other investigators that are part of  14 your office; is that correct?  15 <b>A. The dean of students office? No. There's nobody with</b>  16 <b>the title called "investigator."</b>  17 Q. So there are no other -- other than yourself, there  18 was nobody else, unless it was going to be referred to  19 the police department, who could do any kind of  20 investigation; is that correct?  21 MR. PORTER: Objection. Are you referring  22 to just this specific case? Or any case.  23 MR. FLORES: This specific case.  24 <b>A. As far as I know, the decision was that I should be</b>  25 <b>the person to deal with the case.</b></p>
<p style="text-align: right;">Page 83</p> <p>1 MR. PORTER: Objection. Instruct the  2 witness not to answer if it requires you to divulge  3 communications that are protected by the  4 attorney-client privilege. To the extent that it does  5 not, you are free to answer.  6 <b>THE WITNESS: I'm going reserve my -- not</b>  7 <b>answer.</b>  8 BY MR. FLORES:  9 Q. I'm sorry?  10 <b>A. I'm not going to answer.</b>  11 MR. PORTER: I think based on my  12 instruction, she's decided that she cannot answer that  13 question?  14 MR. FLORES: And, obviously, I'm not  15 agreeing to that claim of privilege, David. We'll  16 deal with it later.  17 BY MR. FLORES:  18 Q. Do you know whether or not any discussion took place  19 involving information received from Loretta Robichaud?  20 <b>A. I -- I don't recall.</b>  21 Q. Did you make any record of having reviewed the  22 complaint involving my client at the BIT, any notes,  23 any other writings?  24 <b>A. Me personally, no.</b>  25 Q. And as a result of the BIT, did there come a time that</p>	<p style="text-align: right;">Page 85</p> <p>1 BY MR. FLORES:  2 Q. And who made that decision?  3 MR. PORTER: I would object and instruct  4 the witness not to answer if it requires you to  5 divulge attorney-client privileged communications, but  6 to the extent that it doesn't, you are free to answer.  7 <b>A. I will just say it was determined that I should be the</b>  8 <b>one to meet with the students.</b>  9 BY MR. FLORES:  10 Q. Were you given a timetable in which to do that?  11 <b>A. No, I wasn't given any specifics of a timetable other</b>  12 <b>than to typically do what we normally do and do our</b>  13 <b>best to schedule meetings and contact the -- both</b>  14 <b>parties and do our best depending on our schedule.</b>  15 Q. Did you handle that matter in the same way that you  16 handle other investigations?  17 MR. PORTER: Objection, form.  18 <b>A. I'm not sure I understand your question.</b>  19 BY MR. FLORES:  20 Q. Had you ever received direction to handle a particular  21 conduct investigation at a previous meeting of the  22 BIT?  23 <b>A. Well, at that time, I was new to Wayne State, so I</b>  24 <b>would not have been asked to because it was my first,</b>  25 <b>you know, because of the nature of me, you know,</b></p>

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<p style="text-align: right;">Page 86</p> <p>1 <b>starting that semester for the first time.</b></p> <p>2 Q. Okay. Were you given any guidance by the BIT in terms</p> <p>3 of how you should handle this matter?</p> <p>4 MR. PORTER: Objection. Based on</p> <p>5 attorney-client privilege, I would instruct you not to</p> <p>6 answer if it requires to you divulge attorney-client</p> <p>7 privileged communications, but to the extent that it</p> <p>8 doesn't, you are, obviously, free to answer.</p> <p>9 BY MR. FLORES:</p> <p>10 Q. Can you answer that question?</p> <p>11 <b>A. I'm not going to comment, no.</b></p> <p>12 MR. FLORES: For the record, I'm taking an</p> <p>13 exception to that claim of privilege.</p> <p>14 BY MR. FLORES:</p> <p>15 Q. After you received, read, and discussed the complaint</p> <p>16 at the meeting, did you receive any other instructions</p> <p>17 from anyone else after the meeting as to how to handle</p> <p>18 the investigation?</p> <p>19 <b>A. No. I was just asked to meet with both students and</b></p> <p>20 <b>gather the statements and forward them onward and not</b></p> <p>21 <b>to make a determination in the case.</b></p> <p>22 Q. Okay. I just want to make sure that I understand.</p> <p>23 Your responsibility was to talk with both parties,</p> <p>24 correct?</p> <p>25 <b>A. Mm-hmm.</b></p>	<p style="text-align: right;">Page 88</p> <p>1 <b>A. No.</b></p> <p>2 Q. And after getting the -- after having the conversation</p> <p>3 with the complainant and getting copies of text</p> <p>4 messages, did you do anything to corroborate or</p> <p>5 disprove any of the complainant's account?</p> <p>6 <b>A. Just confirming the student's status, you know, that,</b></p> <p>7 <b>you know, like what she was studying and confirming</b></p> <p>8 <b>she, obviously, that she was a student, but no.</b></p> <p>9 Q. At the time that you spoke with her in October of</p> <p>10 2018, was she still a student at WSU?</p> <p>11 <b>A. No --</b></p> <p>12 MR. PORTER: Objection, foundation. Did</p> <p>13 you say October or November?</p> <p>14 MR. FLORES: I said October of 2018.</p> <p>15 <b>A. I believe she was not a student at the time.</b></p> <p>16 BY MR. FLORES:</p> <p>17 Q. Do you know how long -- did you come to learn how long</p> <p>18 she attended Wayne State?</p> <p>19 <b>A. I don't recall off the top of my head, but I recall</b></p> <p>20 <b>possibly that she would have left Wayne State soon</b></p> <p>21 <b>after filing the complaint. I mean graduated.</b></p> <p>22 Q. She started as a freshman in 2016.</p> <p>23 <b>A. Okay.</b></p> <p>24 Q. I'm just giving you that information. Typically, she</p> <p>25 would have graduated after four years, which would</p>
<p style="text-align: right;">Page 87</p> <p>1 Q. Could you answer just "yes" or "no" for the record?</p> <p>2 <b>A. Oh, sorry, yes. Sorry, yes.</b></p> <p>3 Q. And once you'd taken their statements to submit a</p> <p>4 report?</p> <p>5 <b>A. Yeah. The -- not only the statements but also if</b></p> <p>6 <b>there's any evidence for them to share and to document</b></p> <p>7 <b>that and submit it forward.</b></p> <p>8 Q. But you were told not to make a determination as to</p> <p>9 who was right or wrong or --</p> <p>10 <b>A. Right.</b></p> <p>11 Q. -- who was truthful or not truthful?</p> <p>12 <b>A. Right, I was not to make a determination; that was not</b></p> <p>13 <b>my role in this matter.</b></p> <p>14 Q. Okay. And then who did you forward your report to?</p> <p>15 <b>A. So the final report was emailed to Margit Chadwell,</b></p> <p>16 <b>Linda Galante, and also the respondent.</b></p> <p>17 Q. Ms. Galante was general counsel?</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. And the -- I'm sorry, so it was to Dean Chadwell, to</p> <p>20 general counsel's office, and then who else?</p> <p>21 <b>A. The respondent.</b></p> <p>22 Q. So that would have been my client?</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. Were you directed by anyone not to investigate the</p> <p>25 case beyond taking statements?</p>	<p style="text-align: right;">Page 89</p> <p>1 have placed it 2020.</p> <p>2 <b>A. I should correct myself, I moved on from the</b></p> <p>3 <b>university.</b></p> <p>4 Q. Oh, so your departure?</p> <p>5 <b>A. No, no, I'm saying her departure from the university.</b></p> <p>6 <b>So she was not a student at the time.</b></p> <p>7 Q. Okay. So at the time she made the complaint, she was</p> <p>8 not a student?</p> <p>9 <b>A. Right.</b></p> <p>10 Q. And you don't know, as you're sitting here today, when</p> <p>11 she was -- when she left the school after starting in</p> <p>12 2016?</p> <p>13 <b>A. I would have to look at my records that's -- to gather</b></p> <p>14 <b>that information.</b></p> <p>15 Q. At the time that you spoke with the complainant, do</p> <p>16 you know where she was located?</p> <p>17 <b>A. Yeah, she was out of state.</b></p> <p>18 Q. Do you know what state she was in?</p> <p>19 <b>A. I believe, if I recall, I'd have to check, but I think</b></p> <p>20 <b>she said she may have been in Colorado.</b></p> <p>21 Q. And --</p> <p>22 <b>A. But I would have to check.</b></p> <p>23 Q. I'm sorry, could you repeat that answer for the</p> <p>24 record?</p> <p>25 <b>A. Yeah, I would have to check because I don't remember,</b></p>

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<p style="text-align: right;">Page 90</p> <p>1 it was so long ago, I would just have to check, but I</p> <p>2 know that she was out of state.</p> <p>3 Q. And at the time that you interviewed her by telephone,</p> <p>4 did the school have access to a videoconference?</p> <p>5 <b>A. It wasn't something we used, and so I didn't use</b></p> <p>6 <b>videoconferencing with her, with the complainant.</b></p> <p>7 Q. So you were not able to see any facial expressions or</p> <p>8 who else might have been in the room with her while</p> <p>9 she was talking to you; all of that information was</p> <p>10 not available to you?</p> <p>11 <b>A. Well, I didn't see her on video. I just spoke to her</b></p> <p>12 <b>over the phone.</b></p> <p>13 Q. So you did not know if there was anyone in the room</p> <p>14 with her while you were talking with her?</p> <p>15 <b>A. Yeah, I wouldn't have been able to see.</b></p> <p>16 Q. And you didn't -- did you ask her whether or not there</p> <p>17 was anyone there when she was talking to you?</p> <p>18 <b>A. I don't recall asking her because the meeting was just</b></p> <p>19 <b>between me and her, but I don't remember her saying</b></p> <p>20 <b>that there was anybody else in the room. I believe</b></p> <p>21 <b>she was the only one on the phone at the time, and I</b></p> <p>22 <b>didn't hear anyone else commenting or making noises</b></p> <p>23 <b>during our conversation.</b></p> <p>24 Q. Okay. How -- let's go back and talk now about your</p> <p>25 contact with my client.</p>	<p style="text-align: right;">Page 92</p> <p>1 INTRODUCED FOR DISCUSSION:</p> <p>2 EXHIBIT F</p> <p>3 1:11 p.m.</p> <p>4 BY MR. FLORES:</p> <p>5 Q. And if you would go to the second page. Scroll down</p> <p>6 to the bottom half.</p> <p>7 <b>A. Yep, that's from Maxient. That's automatic messaging</b></p> <p>8 <b>from Maxient.</b></p> <p>9 Q. And your letter to them triggers that because you send</p> <p>10 it through the Maxient system?</p> <p>11 <b>A. Correct, so anything coming out of the dean of</b></p> <p>12 <b>students office. It lets the student know that it's</b></p> <p>13 <b>coming from the dean of students office.</b></p> <p>14 Q. Okay. Why don't you just leave that up there for just</p> <p>15 a second so I can ask some related questions.</p> <p>16 Now that email from the -- via Maxient goes</p> <p>17 to the student's student email address; is that</p> <p>18 correct?</p> <p>19 <b>A. Correct.</b></p> <p>20 Q. And does it come with a flag or some type of attention</p> <p>21 grabbing symbol to let the student know that they've</p> <p>22 got an important piece of correspondence from the</p> <p>23 dean's office?</p> <p>24 <b>A. It just comes to their email. As far as I know, it</b></p> <p>25 <b>comes to their email.</b></p>
<p style="text-align: right;">Page 91</p> <p>1 <b>A. Mm-hmm.</b></p> <p>2 Q. Normally, you said you would have an electronic</p> <p>3 message sent to the student informing them that there</p> <p>4 was a letter for them; is that correct?</p> <p>5 <b>A. No.</b></p> <p>6 Q. How would you normally --</p> <p>7 <b>A. I would send them a letter via Maxient software</b></p> <p>8 <b>inviting them to meet with me.</b></p> <p>9 Q. In this particular case, however, you sent to my</p> <p>10 client a note from the dean of students informing him</p> <p>11 that there was a letter waiting for him from the dean</p> <p>12 of students; do you remember that?</p> <p>13 <b>A. No.</b></p> <p>14 Q. Just give me a moment.</p> <p>15 <b>A. I -- yeah. That's probably electronic information</b></p> <p>16 <b>coming from Maxient letting the student know there's</b></p> <p>17 <b>an electronic letter from the dean of students office</b></p> <p>18 <b>that they have to sign into. Once they sign in with</b></p> <p>19 <b>their banner ID, they can open the letter that I would</b></p> <p>20 <b>have sent electronically. So I think that's what you</b></p> <p>21 <b>might be referring to is the automated message that</b></p> <p>22 <b>all students get from me via Maxient software.</b></p> <p>23 MR. FLORES: Okay. Let me just -- Bailey,</p> <p>24 if you would put on the screen Exhibit F, please.</p> <p>25 EXHIBIT TECHNICIAN: One moment.</p>	<p style="text-align: right;">Page 93</p> <p>1 Q. And it looks the same as any other email?</p> <p>2 <b>A. It will say it's from Maxient software. It will say</b></p> <p>3 <b>Maxient in the subject header.</b></p> <p>4 Q. But it's not flagged as "Attention" or flagged as</p> <p>5 "Important" or "Immediate Request"?</p> <p>6 <b>A. No, it's --</b></p> <p>7 Q. There's no --</p> <p>8 (Attorney and witness speak over each</p> <p>9 other.)</p> <p>10 Q. -- attached to it is my question.</p> <p>11 <b>A. Yeah, Maxient doesn't give you the option to put an</b></p> <p>12 <b>alert on the email --</b></p> <p>13 Q. Okay.</p> <p>14 <b>A. -- to, like, ping a student, or something like that,</b></p> <p>15 <b>that would alert them in the email, but it will say</b></p> <p>16 <b>the subject -- that's the subject header, "Official</b></p> <p>17 <b>Correspondence From the Dean of Students Office."</b></p> <p>18 MR. FLORES: Okay. And if you would,</p> <p>19 Bailey, put up Exhibit G.</p> <p>20 EXHIBIT TECHNICIAN: One moment.</p> <p>21 INTRODUCED FOR DISCUSSION:</p> <p>22 EXHIBIT G</p> <p>23 1:14 p.m.</p> <p>24 MR. FLORES: Okay. If you could just show</p> <p>25 that, just scroll through that slowly. Just stop</p>

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<p style="text-align: right;">Page 94</p> <p>1 at -- yeah, put the text in the middle.</p> <p>2 BY MR. FLORES:</p> <p>3 Q. Ms. Camaj, that is the letter that you wrote to</p> <p>4 Anthony?</p> <p>5 <b>A. Mm-hmm. Yes, sorry, I should say yes.</b></p> <p>6 Q. And what was the stated purpose for the meeting?</p> <p>7 <b>A. To discuss concerns reported about alleged behavior on</b></p> <p>8 <b>Wayne State University's campus.</b></p> <p>9 Q. And at the time that you sent that, did you also</p> <p>10 include a statement of the charges for the complaint?</p> <p>11 <b>A. There were no charges filed in this case, so I</b></p> <p>12 <b>wouldn't have included charges because there was no</b></p> <p>13 <b>charges filed.</b></p> <p>14 Q. Did you provide my client with a statement of why he</p> <p>15 was being -- the purpose for the fact-finding</p> <p>16 conference?</p> <p>17 <b>A. No, because I'm not required to, and -- and I just</b></p> <p>18 <b>included in there I wanted to discuss reported</b></p> <p>19 <b>concerns.</b></p> <p>20 Q. So you're telling me that under the Student Code of</p> <p>21 Conduct, you had no responsibility to advise him of</p> <p>22 what he was going to be meeting with you about?</p> <p>23 <b>A. This is not a Student Code of Conduct case because no</b></p> <p>24 <b>charges were filed in the matter, in this matter, I</b></p> <p>25 <b>should say.</b></p>	<p style="text-align: right;">Page 96</p> <p>1 <b>the Code of Conduct term, and so if I'm informed that</b></p> <p>2 <b>someone on campus -- or has alleged to have -- excuse</b></p> <p>3 <b>me. If somebody on campus is alleged to have violated</b></p> <p>4 <b>the Code of Conduct, and somebody wants to file</b></p> <p>5 <b>charges, they can contact our office and file charges.</b></p> <p>6 <b>In this case, no charges were filed.</b></p> <p>7 Q. So your testimony is that Jane Doe's complaint was not</p> <p>8 the filing of a charge against my client?</p> <p>9 <b>A. Right. If it was -- if it was, it would have been</b></p> <p>10 <b>indicated in the letter.</b></p> <p>11 Q. And what additional step would the complainant have to</p> <p>12 have taken to turn her complaint into a charge?</p> <p>13 <b>A. Notify me that she wanted to pursue a charge. They</b></p> <p>14 <b>just -- anybody who wants to file a charge just needs</b></p> <p>15 <b>to let me know that that is what they intend -- that</b></p> <p>16 <b>that is what they want.</b></p> <p>17 MR. FLORES: Bailey, if you would please</p> <p>18 publish Exhibit E.</p> <p>19 EXHIBIT TECHNICIAN: One moment.</p> <p>20 INTRODUCED FOR DISCUSSION:</p> <p>21 EXHIBIT E</p> <p>22 1:19 p.m.</p> <p>23 BY MR. FLORES:</p> <p>24 Q. And go to page 3. Do you see that paragraph that</p> <p>25 starts with "Complaint" --</p>
<p style="text-align: right;">Page 95</p> <p>1 Q. Okay. Even though that the letter says it's a -- the</p> <p>2 matter involves a violation of the Student Code of</p> <p>3 Conduct?</p> <p>4 <b>A. It says it may, and the information that was in the</b></p> <p>5 <b>complaint could have resulted in such and that's the</b></p> <p>6 <b>reason I wanted to discuss this concerning behavior.</b></p> <p>7 <b>It didn't say it did, it said may have.</b></p> <p>8 Q. Well, this just seems to be an effort to make sure</p> <p>9 that he had no idea why he was going to meet with you.</p> <p>10 MR. PORTER: Objection, form.</p> <p>11 <b>A. That's not the intention. It's to get the student in</b></p> <p>12 <b>my office to discuss concerning behaviors that have</b></p> <p>13 <b>been reported to our office, and that's typically what</b></p> <p>14 <b>I do. I'll invite students to meet with me to discuss</b></p> <p>15 <b>concerning behaviors, and then I let them know the</b></p> <p>16 <b>information when they meet with me, and it's not a</b></p> <p>17 <b>conduct case, so I'm not required to share anything</b></p> <p>18 <b>further.</b></p> <p>19 BY MR. FLORES:</p> <p>20 Q. Why wasn't this a conduct case?</p> <p>21 <b>A. Because no charges were filed.</b></p> <p>22 Q. When you say "charge," can you define how you're using</p> <p>23 that term?</p> <p>24 <b>A. Sure. In the Code of Conduct, it indicates that</b></p> <p>25 <b>charges can be filed against the student, and that's</b></p>	<p style="text-align: right;">Page 97</p> <p>1 <b>A. Mm-hmm.</b></p> <p>2 Q. -- Ms. Camaj?</p> <p>3 <b>A. Mm-hmm.</b></p> <p>4 Q. Okay. And then goes to the next page and stop there.</p> <p>5 Do you see what the -- there's a question</p> <p>6 there that reads "What is the outcome you are</p> <p>7 requesting?"</p> <p>8 <b>A. Mm-hmm.</b></p> <p>9 Q. Could you read that to yourself and let me know when</p> <p>10 you're done?</p> <p>11 <b>A. Okay.</b></p> <p>12 Q. And so is it your testimony today that in spite of the</p> <p>13 fact that she asked to have my client held accountable</p> <p>14 and that he be reprimanded, that this is not a request</p> <p>15 for him to be charged with having harassed her; is</p> <p>16 that your testimony?</p> <p>17 <b>A. My testimony is that charges were not filed with me.</b></p> <p>18 Q. Were they filed with anyone else?</p> <p>19 <b>A. Not at the time, nope. Nobody -- no one filed charges</b></p> <p>20 <b>against your client.</b></p> <p>21 Q. Did there come a time that charges were filed against</p> <p>22 my client?</p> <p>23 <b>A. No, and if charges were filed, your client would have</b></p> <p>24 <b>been notified.</b></p> <p>25 Q. So is it your testimony that the complainant did not</p>



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<p style="text-align: right;">Page 106</p> <p>1 selected was the internet charge, and then also --</p> <p>2 misuse of internet, and then also disorderly behavior</p> <p>3 could be one. And then if there were threats made in</p> <p>4 messaging, because at the time of the complaint, I</p> <p>5 didn't have the text messages, so if there were</p> <p>6 threatening messages being shared, you could also</p> <p>7 select section 4.3. So it really depends on what the</p> <p>8 specifics of the charges are that would be brought</p> <p>9 forward by the complainant.</p> <p>10 Q. Thank you. Now in the criminal law, there are charges</p> <p>11 which are very specific, and there are charges which</p> <p>12 are general, so you could be charged with disorderly</p> <p>13 conduct, which incorporates a wide variety of</p> <p>14 material.</p> <p>15 MR. FLORES: You can remove Exhibit F.</p> <p>16 BY MR. FLORES:</p> <p>17 Q. So you have one charge, disorderly conduct. It covers</p> <p>18 a lot of different types of behaviors, but it's just</p> <p>19 one charge. You could also charge somebody with grand</p> <p>20 larceny auto, which is a fairly specific charge</p> <p>21 because you have to steal a car, it's what you would</p> <p>22 expect.</p> <p>23 Charges that are listed in section 4 of the</p> <p>24 Student Code of Conduct, those are set forth with some</p> <p>25 specificity; are they not?</p>	<p style="text-align: right;">Page 108</p> <p>1 Q. Is it described, to your knowledge, in any policy</p> <p>2 statement or regulation or rule that the university</p> <p>3 has published?</p> <p>4 A. Not that I'm aware of.</p> <p>5 Q. So when you hear the term "concerning behavior," will</p> <p>6 you give me your definition of that phrase?</p> <p>7 A. Yeah. You might be doing something that's concerning</p> <p>8 to the greater community, it could be concerning to</p> <p>9 your person, like maybe you are hurting yourself</p> <p>10 individually, you are hurting others on campus, or</p> <p>11 somehow your behavior is impacting others, it could</p> <p>12 be -- it's very broad, so just concerning behaviors</p> <p>13 that could be an issue that we want to, you know,</p> <p>14 figure out what's going on. So it's very broad.</p> <p>15 Q. So did there come a time where my client finally had a</p> <p>16 chance to meet with you?</p> <p>17 A. Yes, he did meet with me.</p> <p>18 Q. And do you remember what date that was?</p> <p>19 A. It would have been in my report that I would have</p> <p>20 indicated. I don't recall off the top of my head, but</p> <p>21 it would be in the documents.</p> <p>22 Q. If I told you it was November 30th, would that seem</p> <p>23 right?</p> <p>24 A. Possibly, yes, yes, that makes sense.</p> <p>25 Q. So right near the end of the month?</p>
<p style="text-align: right;">Page 107</p> <p>1 A. Sure. They're set forth to, you know, to reflect what</p> <p>2 could be possible campus violations.</p> <p>3 Q. And they include a definition?</p> <p>4 A. Right.</p> <p>5 Q. In this case, you're telling me there was no charge</p> <p>6 that was filed because this was a conduct, an</p> <p>7 investigation into conduct, not an -- not an</p> <p>8 investigation into a specific charge; is that right?</p> <p>9 MR. PORTER: Objection, form. It misstates</p> <p>10 her prior testimony.</p> <p>11 BY MR. FLORES:</p> <p>12 Q. And what was your --</p> <p>13 A. In my letter, it specifies that I was going to be</p> <p>14 meeting with the respondent about some concerning</p> <p>15 behavior that was reported to our office. So it was</p> <p>16 about --</p> <p>17 Q. Concerning --</p> <p>18 A. Concerning behavior, correct, that was reported to our</p> <p>19 office that we needed to get more information on.</p> <p>20 Q. Okay. Thank you for refreshing my recollection. That</p> <p>21 was the phrase I was searching for, "concerning</p> <p>22 behavior."</p> <p>23 Is that defined anywhere in the Student</p> <p>24 Code of Conduct?</p> <p>25 A. No, because, again, it's not a charge.</p>	<p style="text-align: right;">Page 109</p> <p>1 A. Mm-hmm.</p> <p>2 Q. And you had received this complaint sometime between</p> <p>3 November -- October 29th, when it was made, and</p> <p>4 November 15th, when you talked to her, when you</p> <p>5 attended the behavioral intervention team meeting, so</p> <p>6 someplace between the 29th of October and November</p> <p>7 15th?</p> <p>8 A. Yeah.</p> <p>9 Q. So somewhere two weeks later, two and a half weeks</p> <p>10 later, you finally met with my client?</p> <p>11 A. Right, yes.</p> <p>12 Q. And you met with him alone?</p> <p>13 A. Yes.</p> <p>14 Q. And you met with him in your office?</p> <p>15 A. Yes.</p> <p>16 Q. Do you remember who started the conversation?</p> <p>17 A. I did.</p> <p>18 Q. And can you tell me what, if anything, you said to</p> <p>19 him?</p> <p>20 A. Yes, the nature of the beginning of my conversation</p> <p>21 was to inform him that I will be speaking to him about</p> <p>22 concerning behavior and that this was not a conduct</p> <p>23 matter that I would be making a determination on and</p> <p>24 that I would be taking a statement based on concerns I</p> <p>25 have gotten from a complainant, the complainant, and</p>

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<p style="text-align: right;">Page 110</p> <p>1 that I would be forwarding the case to the medical 2 school, and the other piece that I said was I'm trying 3 to remember just going down the line. 4 So after I informed him of what was going 5 to happen, I never shut the door, so I always let the 6 student shut the door, and if the student definitely 7 needs a break, I let them know, but that was the 8 beginning of our conversation in terms of me asking 9 questions, and then we began by me asking him what -- 10 does he know the respondent, and what's the nature of 11 their relationship? 12 Q. In a case where you're looking at concerning behavior 13 rather than a charge, even with respect to just 14 concerning behavior, did you have authority at that 15 time to simply address the matter just at your level, 16 or was this case different and you had to send it up 17 to Dean Chadwell? 18 <b>A. It's not what I was asked to do. I was asked to --</b> 19 Q. Okay -- 20 (Attorney and witness speak over each 21 other.) 22 <b>A. -- right, so I -- I would not have been able to exert</b> 23 <b>any authority over this matter.</b> 24 Q. So in this particular case, you were simply an 25 information provider and an information collector, and</p>	<p style="text-align: right;">Page 112</p> <p>1 BY MR. FLORES: 2 Q. But was it because you just were inexperienced and 3 they didn't think you could handle that? 4 <b>A. That was not my directive. It's not about my</b> 5 <b>experience being inexperienced in that -- that's not</b> 6 <b>for me to make a determination on. That was not what</b> 7 <b>I was asked to do.</b> 8 Q. The head of the behavioral intervention team was the 9 person who gave you your assignment; is that right? 10 MR. PORTER: Objection based on 11 attorney-client privilege. If it requires you to 12 divulge attorney-client communications, I'd ask you 13 not to answer. 14 <b>A. Okay. I will not answer.</b> 15 BY MR. FLORES: 16 Q. I'm taking an exception to that. 17 Had you ever sent any of your work directly 18 to Dean Chadwell? 19 <b>A. At that time, no.</b> 20 Q. Had you ever sent any of your work to anyone other 21 than Dean Strauss as of that date? 22 <b>A. As of that date, I don't -- I don't remember. But</b> 23 <b>I -- because it was so early on in my time at Wayne</b> 24 <b>State, I don't know that I had any other cases I would</b> 25 <b>have been assigning to anybody, I mean to forward to</b></p>
<p style="text-align: right;">Page 111</p> <p>1 then you were sending that forward to your boss who 2 was Dean Chadwell? 3 <b>A. Dean Chadwell's not my boss.</b> 4 Q. I'm sorry, Dean Strauss? 5 <b>A. I was moving it forward to Dr. Chadwell and to Linda</b> 6 <b>Galante as requested.</b> 7 Q. So you didn't send it to Dean Strauss? 8 <b>A. No.</b> 9 Q. Okay. That's a little bit out of the normal ordinary 10 course; is that right? 11 <b>A. Well, I typically don't send my outcomes in conduct</b> 12 <b>cases to Dr. Strauss. The code says that I do not</b> 13 <b>have to send him my outcome cases. I only send Dean</b> 14 <b>Strauss the cases that -- my cases when I invite the</b> 15 <b>student to meet with them to make him aware of the</b> 16 <b>charges, but I don't share the outcome with him.</b> 17 Q. Okay. So would you say this was unusual that you were 18 in this role and sending the information you collected 19 to Dean Chadwell? 20 MR. PORTER: Objection, form. 21 <b>A. I don't know about unusual, but it was because of the</b> 22 <b>nature of the timing of my starting there, it would</b> 23 <b>have been one of the first cases I would have done</b> 24 <b>that with just by the pure nature of me being there at</b> 25 <b>that time.</b></p>	<p style="text-align: right;">Page 113</p> <p>1 <b>anybody else at the time.</b> 2 Q. Okay. Are you familiar with the Office of the 3 Ombudsman? 4 <b>A. Yes, I am.</b> 5 Q. And what does the ombudsman's office -- what are they 6 responsible for? 7 <b>A. So one of their main purposes, and we include the</b> 8 <b>ombud's letter in our correspondence to students, to</b> 9 <b>provide them information about the policies and</b> 10 <b>procedures at Wayne State University. So they are not</b> 11 <b>ones to make decisions on cases, like in a conduct</b> 12 <b>case, but they are ones to provide students</b> 13 <b>information about proceedings.</b> 14 Q. And is this -- 15 <b>A. And policies.</b> 16 Q. I'm sorry. 17 <b>A. Go ahead.</b> 18 Q. I didn't hear the last part of your answer. 19 <b>A. Sorry. They -- I just repeated what I said that they</b> 20 <b>informed students about procedural matters and</b> 21 <b>policies.</b> 22 Q. And in this case, did you refer my client to the 23 office of the ombudsman? 24 <b>A. No, because I wasn't required to.</b> 25 Q. And that was because it wasn't -- there were no</p>

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<p style="text-align: right;">Page 114</p> <p>1 charges --</p> <p>2 <b>A. Correct.</b></p> <p>3 Q. -- it was just a concerning behavior matter?</p> <p>4 <b>A. Correct.</b></p> <p>5 Q. Okay. Based on your training, is a matter of</p> <p>6 concerning behavior more serious or less serious than</p> <p>7 charges being leveled at a student?</p> <p>8 MR. PORTER: Objection, form.</p> <p>9 <b>A. It depends on the situation. I've had it where the</b></p> <p>10 <b>concerning behavior could be worse based on the</b></p> <p>11 <b>students that respond -- excuse me, the student's</b></p> <p>12 <b>behavior in the classroom could have been a little</b></p> <p>13 <b>more dangerous versus conduct charges, where some</b></p> <p>14 <b>conduct charges could have been less. So I've seen</b></p> <p>15 <b>both.</b></p> <p>16 BY MR. FLORES:</p> <p>17 Q. Did Mr. -- did my client raise any questions with you</p> <p>18 that you could not answer?</p> <p>19 <b>A. If there were any questions about medical school</b></p> <p>20 <b>stuff, I would not be able to answer, but I don't</b></p> <p>21 <b>recall him asking me that. But if he were to ask me</b></p> <p>22 <b>anything about conduct, I would have definitely</b></p> <p>23 <b>answered it for him, and especially if he asked me can</b></p> <p>24 <b>he -- he asked if he could include an apology letter.</b></p> <p>25 <b>I said absolutely you can include that. I informed</b></p>	<p style="text-align: right;">Page 116</p> <p>1 <b>A. I would never say that. I don't -- I don't ever</b></p> <p>2 <b>remember saying that. Typically, I ask the students</b></p> <p>3 <b>to come and meet with me, and then I discuss the</b></p> <p>4 <b>concerning behavior that was reported in front of</b></p> <p>5 <b>them.</b></p> <p>6 Q. Between the time that you spoke with the complainant</p> <p>7 and you spoke to my client, did you do any independent</p> <p>8 investigation to either verify or contradict either</p> <p>9 person's statement?</p> <p>10 MR. PORTER: Objection, asked and answered.</p> <p>11 You may answer.</p> <p>12 <b>A. Okay. So when the complainant stated that text</b></p> <p>13 <b>messages were sent, I noticed that I couldn't open</b></p> <p>14 <b>them, so I did request that they be sent to me again,</b></p> <p>15 <b>and also, when the complainant made her statements in</b></p> <p>16 <b>the complaint, itself, I verified that what was said,</b></p> <p>17 <b>there was text messages to corroborate as --</b></p> <p>18 <b>corroborate as she indicated to see that they matched</b></p> <p>19 <b>up.</b></p> <p>20 And then waiting, then, I waited to speak</p> <p>21 to the respondent to confirm that he was in a text</p> <p>22 message situation with the complainant to confirm that</p> <p>23 these were sent by him, as well. So that's -- that's</p> <p>24 all I did is just to confirm that text messages were</p> <p>25 sent between the two parties.</p>
<p style="text-align: right;">Page 115</p> <p>1 him he can provide me a statement after our meeting,</p> <p>2 and he said he would, and I answered questions about</p> <p>3 how he could send that to me by email. So that's what</p> <p>4 I can recall at that time.</p> <p>5 Q. Did you share with him at any point in your meeting</p> <p>6 that you believed this was a very serious case?</p> <p>7 <b>A. I don't recall using that word, no.</b></p> <p>8 Q. Do you remember -- do you recall what word you might</p> <p>9 have used to describe this case?</p> <p>10 <b>A. I don't think I would have described it. I would have</b></p> <p>11 <b>said "concerning behavior" because, again, it wasn't</b></p> <p>12 <b>for me to make a determination. So I don't know that</b></p> <p>13 <b>I would have made a value judgment on the type of case</b></p> <p>14 <b>or the seriousness of it.</b></p> <p>15 Q. Do you remember having a conversation with him at the</p> <p>16 beginning where he asked you why you had not answered</p> <p>17 his emails?</p> <p>18 <b>A. Possibly. It was so long, I -- I may have told him</b></p> <p>19 <b>similar to what I told you where, again, it's not my</b></p> <p>20 <b>intention to ignore students.</b></p> <p>21 Q. Do you remember telling him that you didn't provide</p> <p>22 any information because that was your -- your typical</p> <p>23 strategy, you waited until someone came to your office</p> <p>24 and then you confronted them in person to see if you</p> <p>25 could shake their story?</p>	<p style="text-align: right;">Page 117</p> <p>1 Q. Did you do any work to confirm or disprove any of the</p> <p>2 allegations pertaining to hacking of my client's</p> <p>3 computers?</p> <p>4 <b>A. No, because that's not my expertise, and I recall the</b></p> <p>5 <b>respondent mentioning that and us talking about what</b></p> <p>6 <b>he did in terms of reporting it to other parties such</b></p> <p>7 <b>as C&amp;IT or Apple, I think it was Apple at the time</b></p> <p>8 <b>that he was consulting with, and so I -- because</b></p> <p>9 <b>that's not my expertise. So I would ask them did they</b></p> <p>10 <b>do any work to see who may have hacked them? And then</b></p> <p>11 <b>also with the police.</b></p> <p>12 Q. Okay. And do you know whether or not Wayne State</p> <p>13 Police Department or Wayne State's Computer Science</p> <p>14 Department have forensic specialists that could have</p> <p>15 done that investigation?</p> <p>16 MR. PORTER: Objection, form.</p> <p>17 <b>A. I don't know. I -- our C&amp;IT office is always willing</b></p> <p>18 <b>to help students. So if someone has questions about</b></p> <p>19 <b>internet and technologies, they could answer basic</b></p> <p>20 <b>questions, and then if something's happening on</b></p> <p>21 <b>campus, they could look into it, but something</b></p> <p>22 <b>external, that would assume that the police would need</b></p> <p>23 <b>to be involved. It was, like, an outside source,</b></p> <p>24 <b>like, somebody else -- like a Snapchat, which was</b></p> <p>25 <b>mentioned, and someone's phones. I would assume that</b></p>

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<p style="text-align: right;">Page 130</p> <p>1 <b>A. That's not what I said.</b></p> <p>2 MR. FLORES: I'll withdraw it.</p> <p>3 BY MR. FLORES:</p> <p>4 Q. Is there a reason that you waited so late to contact</p> <p>5 my client and ask to meet with him?</p> <p>6 <b>A. No, it would have just been my scheduling because I</b></p> <p>7 <b>have my calendar, and if I -- my calendar is booked,</b></p> <p>8 <b>then I would have delayed the meeting, but there was</b></p> <p>9 <b>no ill intent to delay the meeting at all.</b></p> <p>10 Q. And you submitted that report on December 4th, 2018;</p> <p>11 is that correct?</p> <p>12 <b>A. Yeah, that's the date on the report.</b></p> <p>13 Q. And do you remember what day of the week that was?</p> <p>14 <b>A. I don't. I would have to check the calendar; I don't</b></p> <p>15 <b>remember.</b></p> <p>16 Q. Do you remember if you worked the full month of</p> <p>17 December?</p> <p>18 <b>A. What do you mean? Like was I in the office?</b></p> <p>19 Q. Were you in the office? Did you take off for</p> <p>20 Christmas break?</p> <p>21 <b>A. I believe I was, I -- all of us have the same</b></p> <p>22 <b>Christmas break at Wayne State, so it would have</b></p> <p>23 <b>started on the 23rd or 22nd, because I usually take my</b></p> <p>24 <b>time off when most students take time off. So that</b></p> <p>25 <b>would have been that week where we get off for Wayne</b></p>	<p style="text-align: right;">Page 132</p> <p>1 <b>messages that I should have included. Some of it may</b></p> <p>2 <b>have been repeated, but all of them should have been</b></p> <p>3 <b>there.</b></p> <p>4 Q. After you sent the report to Dean Chadwell, did you</p> <p>5 have any direct communication with her by telephone or</p> <p>6 in person?</p> <p>7 <b>A. No, because my role was done.</b></p> <p>8 Q. Did you ever talk with Dean Jackson at the medical</p> <p>9 school?</p> <p>10 <b>A. Not about this case, nope.</b></p> <p>11 Q. How about Dean Richard Baker?</p> <p>12 <b>A. No.</b></p> <p>13 Q. Did you ever speak with Loretta Robichaud about this</p> <p>14 case?</p> <p>15 <b>A. No.</b></p> <p>16 Q. Did you ever talk to Jane Doe's mother?</p> <p>17 <b>A. No, I did not.</b></p> <p>18 Q. Do you know whether or not Jane Doe provided</p> <p>19 information to anyone at the university?</p> <p>20 <b>A. I don't. I just -- what I know is I got the -- we</b></p> <p>21 <b>reviewed the complaint, so I don't know what else</b></p> <p>22 <b>happened after that. After I submitted my report, I'm</b></p> <p>23 <b>not involved in the case.</b></p> <p>24 Q. When you joined Wayne State your first year, you were</p> <p>25 a student conduct officer, not a Title IX</p>
<p style="text-align: right;">Page 131</p> <p>1 <b>State.</b></p> <p>2 Q. All right. Now, how did you transmit your report to</p> <p>3 Dean Chadwell?</p> <p>4 <b>A. Maxient.</b></p> <p>5 Q. And he is not at the university but in the medical</p> <p>6 school; is that correct?</p> <p>7 MR. PORTER: Objection, form.</p> <p>8 BY MR. FLORES:</p> <p>9 Q. Do you know where Dr. Chadwell works?</p> <p>10 <b>A. Yeah, if you look at her letterhead -- if you look at</b></p> <p>11 <b>the letter, it says that she's at the University</b></p> <p>12 <b>School of Medicine.</b></p> <p>13 Q. And so that system can send information from the Dean</p> <p>14 of Students Office anywhere in the university; is that</p> <p>15 correct?</p> <p>16 <b>A. The Maxient software has email capabilities, and then</b></p> <p>17 <b>you can send emails to anybody that you choose to send</b></p> <p>18 <b>emails to.</b></p> <p>19 Q. And that's how you communicated, and that's how you</p> <p>20 sent this particular report?</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. And did that report include the attachments, the text</p> <p>23 messages?</p> <p>24 <b>A. Yes, it should have included everything. I believe it</b></p> <p>25 <b>did. There should be about 11 to 12 pages of text</b></p>	<p style="text-align: right;">Page 133</p> <p>1 investigator; is that correct?</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. Nevertheless, did there come a time that you became</p> <p>4 aware that there was an investigation by the</p> <p>5 Department of Education's Office of Civil Rights of</p> <p>6 the WSU Medical School for retaliation against a</p> <p>7 female student?</p> <p>8 <b>A. It may have been spoken about in front of me in the</b></p> <p>9 <b>meetings that I was, but I was never part of that</b></p> <p>10 <b>discussion and had no knowledge of the proceedings.</b></p> <p>11 Q. As a Title IX investigator, though, are you aware that</p> <p>12 an investigation by the Office of Civil Rights is a</p> <p>13 serious matter?</p> <p>14 MR. PORTER: Objection, form.</p> <p>15 <b>A. Yes, I am aware.</b></p> <p>16 BY MR. FLORES:</p> <p>17 Q. And during your time working for WSU in any capacity,</p> <p>18 did you ever have an occasion to speak to an</p> <p>19 investigator from the Office of Civil Rights from the</p> <p>20 Department of Education?</p> <p>21 <b>A. No.</b></p> <p>22 Q. Are you aware that at the conclusion of the Office For</p> <p>23 Civil Rights' investigation, they found by a</p> <p>24 preponderance of the evidence that the School of</p> <p>25 Medicine had, in fact, retaliated against that female</p>

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<p style="text-align: right;">Page 134</p> <p>1 medical student by expelling her?</p> <p>2 MR. PORTER: Objection, form.</p> <p>3 <b>A. No, I don't know the details of the case.</b></p> <p>4 BY MR. FLORES:</p> <p>5 Q. Did you ask -- did you ever ask the complainant for an</p> <p>6 opportunity to speak to her mother or her father?</p> <p>7 <b>A. No.</b></p> <p>8 Q. And even though she stated in her complaint that she</p> <p>9 had recently talked to her parents about this matter,</p> <p>10 you made no effort to speak to them?</p> <p>11 <b>A. No, I did not contact the parents.</b></p> <p>12 Q. Because there was no charge in this case for you to</p> <p>13 investigate, and my client was being -- the inquiry</p> <p>14 focused on concerning behavior, did my client have an</p> <p>15 obligation under the school conduct code to meet with</p> <p>16 you?</p> <p>17 <b>A. Again, this was not a conduct matter so --</b></p> <p>18 Q. So the answer would be no?</p> <p>19 <b>A. Right:</b></p> <p>20 Q. Did you tell him that he had no obligation to meet</p> <p>21 with you?</p> <p>22 <b>A. No, I don't typically say that to students, they have</b></p> <p>23 <b>no obligation. That's just not language that I use.</b></p> <p>24 Q. Well, is there some language that you could use to</p> <p>25 communicate that?</p>	<p style="text-align: right;">Page 136</p> <p>1 off-camera discussion. I can't do that until Friday</p> <p>2 since I'm going to apparently do -- I'm going to be</p> <p>3 handling the deposition tomorrow. So I've got to get</p> <p>4 preparing for that, but if we can set aside, if you</p> <p>5 can let me know Friday what might work for you in</p> <p>6 terms of a call or maybe with you and Ms. Hardy, that</p> <p>7 would be good.</p> <p>8 MR. PORTER: Yeah, that sounds good, we'll</p> <p>9 set it up.</p> <p>10 MR. FLORES: Thank you very much. Do you</p> <p>11 need any other information from me, Leisa?</p> <p>12 COURT REPORTER: Just your transcript</p> <p>13 orders. Did you want to order the transcript?</p> <p>14 MR. FLORES: Yes.</p> <p>15 COURT REPORTER: And did you need this</p> <p>16 expedited?</p> <p>17 MR. FLORES: As quickly as you can get it.</p> <p>18 I don't know what your schedule is, so...</p> <p>19 COURT REPORTER: On Friday?</p> <p>20 MR. FLORES: That's great.</p> <p>21 COURT REPORTER: Did you want a copy,</p> <p>22 Mr. Porter?</p> <p>23 MR. PORTER: You know what, I need to</p> <p>24 follow up with you on that. I'll be in touch.</p> <p>25 (The deposition was concluded at 2:33 p.m.)</p>
<p style="text-align: right;">Page 135</p> <p>1 <b>A. It's just not something that I -- I do.</b></p> <p>2 Q. Of course not.</p> <p>3 <b>A. Right.</b></p> <p>4 Q. Because if you told them that, they didn't need to</p> <p>5 come and talk with you, many of them would not; is</p> <p>6 that right?</p> <p>7 MR. PORTER: Objection, calls for</p> <p>8 speculation.</p> <p>9 MR. FLORES: Withdrawn.</p> <p>10 BY MR. FLORES:</p> <p>11 Q. And your testimony is that after you submitted that</p> <p>12 report on December 4th, you had no further contact or</p> <p>13 anything to do with this case, and you had no</p> <p>14 conversations with anyone, including anyone in the</p> <p>15 general counsel's office or counsel for the</p> <p>16 university?</p> <p>17 <b>A. Yeah, I had no further involvement in the case. I</b></p> <p>18 <b>don't even know what was decided or the outcome. So</b></p> <p>19 <b>I, again, I was only there to investigate.</b></p> <p>20 MR. FLORES: Okay. All right, well,</p> <p>21 Ms. Camaj, I -- this is a serious matter, and if I was</p> <p>22 a little too aggressive, I apologize, I didn't mean to</p> <p>23 do that; it's the nature of the process sometimes.</p> <p>24 David, I want to thank you for your</p> <p>25 cooperation here. We should probably have an</p>	<p style="text-align: right;">Page 137</p> <p>1 Signature of the witness was not requested</p> <p>2 by counsel for the respective parties</p> <p>3 hereto.)</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>